

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CAPTEC FINANCIAL GROUP, INC.,
24 Frank Lloyd Wright Dr.
Lobby 1, 4th Floor
Ann Arbor, Michigan 48106,

Plaintiff,

vs.

BAGGA ENTERPRISES, INC.,
121 Dickerson Road, Unit 6
North Wales, Pennsylvania 19454,

JAMUNA REAL ESTATE, LLC
121 Dickerson Road, Unit 6
North Wales, Pennsylvania 19454

UNITED MANAGEMENT SERVICES, INC.,
121 Dickerson Road, Unit 6
North Wales, Pennsylvania 19454,

-and-

WELCOME GROUP, INC.
121 Dickerson Road, Unit 6
North Wales, Pennsylvania 19454,

Defendants.

Civil Action No. 02-CV-2684

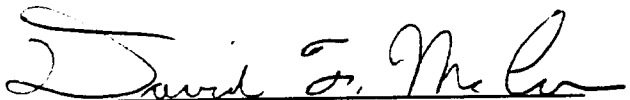
**MOTION FOR ENTRY OF
DEFAULT PURSUANT TO R. CIV. P. 55(a)**

Plaintiff, Captec Financial Group, Inc., by and through its undersigned attorneys,
hereby Moves this Honorable Court for entry of Default Judgment against Defendants Bagga
Enterprises, Inc., Jamuna Real Estate, LLC, United Management Services, Inc., and Welcome

Group, Inc., for failure to plead or otherwise respond to Plaintiff's Complaint, and in support thereof asserts the following:

1. This action was instituted by Complaint and Summons on May 14, 2002. A copy of the Summons with Proof of Service is attached hereto and incorporated by reference herein as Exhibit "A."
2. The parties entered into a Forbearance Agreement on or around June, 2002, whereby Plaintiff agreed to wait until August 30, 2002, before continuing its pursuit of legal action against the Defendants. Due to the confidential nature of the Forbearance Agreement, it is not attached, but will be provided to the Court upon request.
3. The Forbearance Agreement has now expired, and has not been extended.
4. To date, no Answer or other responsive pleading has been filed.
5. An affidavit of counsel, David F. McCann, Esquire, affirming the averments herein is attached and incorporated by reference herein as Exhibit "B."

WHEREFORE, Plaintiff Captec Financial Group, Inc. requests the Clerk to enter a Default Judgment pursuant to Fed. R. Civ. P. 55(a).



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Attorneys for Plaintiff

Dated: September 13, 2002